

AMERI LAW FIRM
— Attorneys At Law —

December 14, 2024

Via Electronic Filing:

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: State Farm Mut. V. Metro Pain
Case No.: 1:21-cv-05523

Dear Judge Kuo:

As Your Honor is aware, this firm represents third-party Michael Torres in the above-captioned matter. I write to respectfully advise the Court regarding the status of our compliance with the subpoena issued in this case.

While we previously produced documents in response to the subpoena, we acknowledge that the format of the production was not in compliance with the requested specifications. In light of this, we have conferred with the relevant parties, and we have agreed to produce the outstanding materials in the proper format. We have further conceded to an extension of time for our client to complete this production, with the new agreed-upon deadline being December 31, 2024.

Accordingly, we respectfully request that the Court adjourn the hearing currently scheduled to address this matter to January 9, 2024, or another date convenient to the Court's calendar.

We appreciate the Court's attention to this matter and thank Your Honor for your consideration.

Respectfully Submitted,
AMERI LAW FIRM, LLC

/s/ Nima Ameri
Nima Ameri, Esq.

CC: All Counsel of Record

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